

Doc Code:

PTO/SB/21 (09-06)

Approved for use through 03/31/2007. OMB 0651-0031

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# TRANSMITTAL FORM

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Total Number of Pages in This Submission

Application Number

09/925,601

Filing Date

August 10, 2001

First Named Inventor

Shunichi HOSOYAMADA

Art Unit

2629

Examiner Name

D. Q. Dinh

Attorney Docket Number

N01280US

## ENCLOSURES (Check all that apply)

- ☐ Fee Transmittal Form
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- ☐ Amendment / Reply
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- ☐ Affidavits/declaration(s)
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Remarks

## SIGNATURE OF APPLICANT, ATTORNEY, OR AGENT

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Date *March 23, 2007* Reg. No. **36,769**

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**THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BOARD OF PATENT APPEALS AND INTERFERENCES**

In re Application of

Shunichi HOSOYAMADA

Serial No.: 09/925,601

Group Art Unit: 2629

Filed: August 10, 2001

Examiner: Dinh, D. Q.

For: **METHOD AND CIRCUIT FOR DRIVING LIQUID CRYSTAL DISPLAY AND  
IMAGE DISPLAY DEVICE**

Commissioner of Patents  
Alexandria, VA 22313-1450

**APPELLANT'S REPLY BRIEF ON APPEAL**

Sir:

In accordance with 37 CFR § 41.41, Appellant submits this Reply Brief in response to the Examiner's Answer mailed on January 23, 2007. Since Appellant earlier filed corrected Appeal Briefs that account for the revised claim status as reflecting the allowed claims, this Reply Brief merely adds the following arguments to those of record in the Appeal Brief.

Appellant first notes that the Examiner's Answer contradicts itself relative to the status of claims 52-54, since claims 53 and 54 are listed in paragraph 1 on page 3 as being rejected but listed in paragraph 2 on page 7 as being allowed.

As now best understood from the Examiner's Answer, the rejection currently of record relies upon the AAPA architecture shown in Figure 12 of the present application. Rather than using one of the polarity patterns shown in Figures 13A through 16 in AAPA, the rejection is based upon actually substituting the polarity reversal pattern shown in Figures 13A/13B of

Moriyama. The motivation for making this modification is given as being the description at line 65 of column 7 through line 2 of column 8 of secondary reference Moriyama.

That is, as best understood, the Examiner considers that, if the polarity pattern shown in Figures 13A/13B of secondary reference Moriyama were to be used in AAPA, then the plain meaning of independent claim 1 would be satisfied and the motivation to substitute this polarity pattern would be that power consumption would be reduced to one half.

Appellant respectfully submits that this rejection fails to meet the initial burden of a *prima facie* rejection, both as failing to provide a proper motivation to modify primary reference AAPA and as failing to result in the claimed invention even if this modification were to be made. This failure shows up in at least the following deficiency.

Relative to satisfying the plain meaning of the language of independent claim 1, Appellant submits that the pattern shown in Figure 13A of Moriyama does indeed arguably show a polarity reversal pattern for lines 2/3, lines 4/5, and lines 6/7, where  $n$  equals 2. However, the polarity reversal pattern clearly fails to be satisfied for lines 1/2, lines 3/4, and lines 5/6.

Appellant submits that this satisfaction of the described polarity reversal pattern for only one half of the lines of the LCD display fails to satisfy the plain meaning of the language of the final claim limitation of independent claim 1, since this language clearly requires that the reversal occur for every line of the LCD, not for every other line.

Hence, turning to the clear language of the claim, in AAPA and/or Moriyamo, there is no teaching or suggestion of: "... reversing a polarity for every signal electrode in said liquid crystal display ....", as required by independent claim 1.

For this reason alone, even if primary reference AAPA were to be modified to substitute the polarity pattern shown in Figures 13A and 13B of Moriyama, the resultant combination

would still fail to satisfy the plain meaning of the claim language of independent claim 1.  
Independent claims 7, 13, 25, 31, 37, 49, 50, and 51 has similar language.

Relative to independent claims 53 and 54, the polarity reversal pattern of Figures 13A and 13B of Moriyama clearly do not show a slanted orientation but, rather, would have to be considered as some type of a jagged vertical slant.

Second, relative to the urged modification of primary reference AAPA by secondary reference Moriyama, the Examiner alleges that substitution of the pattern of 13A/13B of this reference into AAPA would reduce power dissipation. To support this position, the Examiner points to line 67 of column 7 through line 2 of column 8.

Appellant submits that this power reduction is relative to the polarity pattern of the prior art described in Moriyama, and does not necessarily apply to any and all other LCD polarity distribution patterns. That is, as described at lines 19-23 of column 8 of Moriyama, the reduced power dissipation arises because the polarity is reduced every second line, rather than every line.

In order to allege that power dissipation would be reduced in AAPA patterns shown in 13A-16, the Examiner needs to justify that substitution of the Moriyama 2H pattern would similarly reduce power dissipation in AAPA. There is no attempt to make such justification in the rejection. Absent such showing of reduced power in AAPA, Appellant submits that there is no reasonable motivation to substitute the Moriyama polarity pattern into AAPA. Therefore, the rejection currently of record fails to meet the initial burden of a *prima facie* rejection.

## CONCLUSION

In view of the foregoing, Appellant submits that claims 1-18, 25-42, 49, 50, 53, and 54 are clearly and patentably distinct from the prior art of record and in condition for allowance, in addition to claims 19-24, 43-48, and 52, which are allowed. Thus, the Board is respectfully requested to remove the rejection for these claims.

Please charge any deficiencies and/or credit any overpayments necessary to enter this paper to Attorney's Deposit Account number 50-0481.

Respectfully submitted,

Dated: 3/23/07



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